

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Nancy Hurt,)	
Complainant,)	
v.)	File No. EC-2024-0108
)	
Union Electric Company d/b/a Ameren Missouri,)	
Respondent)	

AMEREN MISSOURI'S RESPONSE TO STAFF REPORT

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "the Company"), and for its *Response to Staff Report* states as follows:

1. On September 27, 2023, Complainant filed a complaint with the Missouri Public Service Commission ("Commission") against the Company ("Complaint").
2. Ameren Missouri filed its Answer and Affirmative Defenses on October 26, 2023.
3. On December 20, 2023, the Staff of the Missouri Public Service Commission ("Staff") filed a report ("Report") stemming from its investigation of the Complaint.
4. In its Report, Staff recommends that Ameren Missouri amend its Denial of Service letters to comply with 20 CSR 4240-13/035(1)(C). Secondly, Staff recommends that Ameren Missouri revise its tariffs to include definitions for standard and non-standard meter types.
5. Ameren Missouri does not object to either recommendation. However, this should not be read as Ameren Missouri agreeing to add an option to leave existing AMR meters in place. Leaving the AMR meter has never been an option under the Company's tariffs, and it would be inappropriate to force a change that would shift costs that should be borne by a customer (meaning any customer wanting to opt out of a smart meter) to the Company in a complaint case. The Company is willing to further discuss its reasons with Staff as it works through the revised tariff process. If Staff ultimately disagrees with Ameren Missouri's position, it is more appropriate for

this matter to be taken up in a rate review, where all costs are addressed while setting the Company's revenue requirement.

WHEREFORE, the Company respectfully requests that the Commission order changes to Ameren Missouri's Denial of Service letters and to its tariffs as set forth above.

/s/ Wendy K. Tatro _____

Wendy K. Tatro, #60261
Director & Assistant General Counsel
Ameren Missouri
1901 Chouteau Avenue, MC 1310
St. Louis, MO 63103
(314) 554-3484 (phone)
(314) 554-4014 (fax)
AmerenMOService@ameren.com

**Attorney for Union Electric Company
d/b/a Ameren Missouri**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the parties of record on this 2nd day of January, 2024.

/s/ Wendy Tatro
Wendy Tatro